

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

KRISTI VUKSANOVICH,  
MARK VUKSANOVICH,

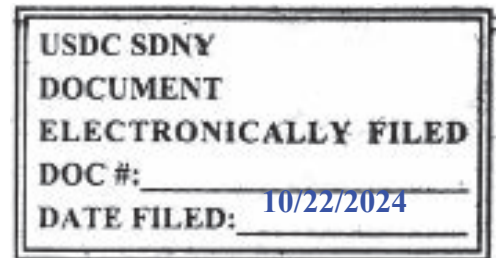
Plaintiffs,

v.

AIRBUS AMERICAS, INC.,  
AIRBUS S.A.S.,

Defendants.

Case No. 1:21-cv-3454- JHR



**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE  
TO FILE OUT OF TIME AND FILE PROVISIONALLY UNDER SEAL**

Defendants Airbus Americas, Inc. and Airbus S.A.S. respectfully ask the Court to grant them leave to file out of time Defendants' Reply in Support of their Statement of Undisputed Facts and Defendants' Reply to Plaintiffs' Statement of Additional Material Facts. The Court's amended scheduling order set the deadline for filing of replies on October 18, 2024. *See* Dkt. 184. However, Defendants inadvertently failed to file these documents when they filed their reply brief in support of their Motion for Summary Judgment on Friday, October 18, 2024. Counsel for Defendants noticed the error the morning of Monday, October 21 and have worked diligently to correct the mistake.

Additionally, Defendants ask the Court to grant them leave to file the replies provisionally under seal. The replies contain confidential information from both parties, and the parties will file agreed-upon, redacted versions of the replies by November 1, 2024.

Counsel for Plaintiffs do not oppose this motion and allowing this filing will not cause any delay to these proceedings or otherwise prejudice Plaintiffs.

Attached as exhibits to a forthcoming declaration, filed provisionally under seal, are the two replies:

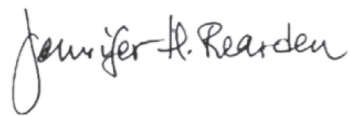
Exhibit 1: Defendants' Reply in Support of their Statement of Undisputed Facts

Exhibit 2: Defendants' Reply to Plaintiffs' Statement of Additional Material Facts

Application GRANTED.

The Clerk of Court is directed to terminate ECF No. 223.

SO ORDERED.



Jennifer H. Rearden, U.S.D.J.

Dated: October 22, 2024

Respectfully submitted by:

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Airbus S.A.S.*

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on the date of electronic filing.

/s/ Christopher M. Odell

Christopher M. Odell